

CORRES. CONTROL
OUTGOING LTR NO.

JOE ORDER# 5633.3
94 RF 08684

DIST.	LTR	ENC
AMARAL, M.E.		
BURLINGAME, A.H.		
BUSBY, W.S.		
BRANCH, D.B.		
CARNIVAL, G.J.	X	
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAH, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.	X	
KUESTER, A.W.		
MARX, G.E.		
MCDONALD, M.M.		
MCKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLIN, N.B.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STEWART, D.L.		
STIGER, S.G.	X	
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
Rusan, J. S.	X	
Sm File 6.3	X	
Vogel, M.L.	X	
CORRES. CONTROL	X	X
ADMN RECORD/080		
TRAFFIC		
PATS/T130G		

CLASSIFICATION:

UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE

J. Macomini
DATE 8-19-94

IN REPLY TO REF CC NO:
62918-RF-94

ACTION ITEM STATUS
3 PARTIAL/OPEN
X CLOSED
LTR APPROVALS:

ORIG & TYPIST INITIALS
FWL/ASG

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

August 19, 1994

Jessie M. Roberson, Acting Assistant Manager
Environmental Restoration
Building 116
DOE, RFFO

SURVEILLANCE OF HIGH PURITY GERMANIUM RADIOLOGICAL SURVEY - REK-454-94

Ref: J. M. Roberson ltr (ER:DEJ:07561), to S. G. Stiger, High Purity Germanium
Crystal Detector Radiological Survey Surveillance Report, July 19, 1994

The purpose of this correspondence is to respond to the four findings identified in the Department of Energy/Rocky Flats Field Office/Environmental Restoration surveillance conducted on May 27, 1994. The report of these findings reached the organization responsible for the High Purity Germanium Detector Radiological Survey last week. The findings are valid and action plans are being developed to address them. In some cases, additional funding will be required to fully address the findings. A brief statement of our position on each finding follows:

Finding 1) "The radiological and ground positioning data are not being collected utilizing formally approved procedures. However, for the radiological data, the current procedure draft (G) has been approved for use by the Environmental Protection Agency (EPA), but not by Colorado Department of Health (CDH) at the present time. The procedures (GT.27, .28, and .29) controlling the ground positioning system (GPS) have not been approved either. It should be noted that all parties, including the regulators, are aware that the procedures have not been completely or formally approved. Correspondence to the regulators from DOE ER requesting approval or the status of the approval process are on file and indicate attempts for more than one year to obtain final approval."

Response: These procedures have not been transferred to Materials Measurements (MM) for control or concurrence. These documents will be incorporated into our Quality Records system, and concurrence will be tracked by MM.

Finding 2) "Field Sampling and Analysis Plans have not been approved and the Data Quality Objectives (DQOs) and Quality Control (QC) criteria are not adequate. The following are examples of deficiencies in the DQO/QA process:

"REVIEWED FOR CLASSIFICATION

By J. Macomini
Date 8-19-94

ADMIN RECORD

SW-A-003493

Best Available Copy

27

Jessie M. Roberson
August 19, 1994
94-RF-08684
Page 2

- a) Requirements and specifications have not been established for repeating field locations and/or establishing one or more "base stations" in order to quantify the variability of the data due to equipment and /or environmental conditions; and
- b) Calibration verification has not been performed at the end of the day's sampling. Equipment calibration checks, utilizing certified radioactive isotope sources are performed at the beginning of the day. However, a final "source check" is not being regularly performed at the end of the day to demonstrate and verify the stability and variability of the system."

Response: Field Sampling and Analysis Plans are the responsibility of the organizations requesting the measurements. Sampling Plans define where to measure and how. Contact will be made with the appropriate organizations to determine if these plans exist. DQOs need to be specified by the users of the measurement results. QC criteria will be documented in a qualification plan.

- a) Replicate measurement requirements need to be determined by the users of the measurements. Repeatability will be addressed in the qualification plan.
- b) Final source measurements have been addressed and are documented in the log book.

Finding 3) "The Method Validation Study Plan has not been approved. The most recent draft of the plan is dated May 20, 1994. The purpose of this study is to demonstrate the appropriateness of the HPGe methods and technology to meet the specific data needs of the Rocky Flats Plant."

Response: The Method Validation Study has been released in draft form. Materials Measurements strongly encourages the performance of this study. However, this study will require funding. This study addresses issues raised in the second finding.

Finding 4) "Discussions with cognizant DOE and EG&G personnel after the field observations indicate that the HPGe equipment software is not properly controlled. There have apparently been undocumented changes in the software parameters, such as instrument constants, without formal documentation, review, testing, and approval."

4/3

Jessie M. Roberson

August 19, 1994

94-RF-08684

Page 3

Response: The control of the software employed for the radiological characterization using germanium detectors had been identified by Materials Measurements personnel as a major concern before receipt of these four findings. The steps to correct this will be detailed in an action plan. Extensive work to verify the existing software will be required as well as steps to assure proper maintenance and control.

The action plan to address these findings will require six weeks to prepare and receive concurrence. If you have any questions, please contact Frank Lamb on Extension 6293 or Digital Page 7116.



R. E. Kell, Director
Engineering & Safety Services
EG&G Rocky Flats, Inc.

FWL:ajg

Orig. and 1 cc - J. M. Roberson

cc:

D. A. Hicks - DOE, RFFO